

## UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

RASHERE CHAMBERS

Case No. 21-MJ-1472

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 3, 2021 in the county of Philadelphia in the  
Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section**Offense Description*

Title 18, U.S.C. Section 2113(d)

Armed Bank Robbery

Title 18, U.S.C. Section 1951(a)

Robbery Which Interferes with Interstate Commerce

Title 18, U.S.C. Section 924(c)(1)(A)

Carrying a Firearm During and in Relation to a Crime of Violence (2 counts)

(i)

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet./s James Finnegan*Complainant's signature*James Finnegan, FBI*Printed name and title*

Sworn to before me and signed in my presence.

Date: 09/28/2021/s Timothy R. Rice*Judge's signature*City and state: Philadelphia, PAHon. Timothy R. Rice, U.S. Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, James F Finnegan, being duly sworn under oath and deposed, state the following:

1. I have been employed by the Federal Bureau of Investigation for the last 15 years as a Special Agent. I am presently assigned to the Violent Crimes Task Force (VCTF) where I investigate violations of state and federal laws related to commercial robberies, bank robberies, kidnappings, fugitives, and major theft investigations of pharmaceutical drugs, among other violations of the law. The statements in this affidavit are based on my review of police reports, the recovery of physical evidence from the crime scenes, and information provided to me by law enforcement personnel. These statements are true and correct to the best of my knowledge, information, and belief.

2. This affidavit is being submitted in support of a criminal complaint and arrest warrant charging Alonzo NORWOOD with aiding and abetting armed bank robbery in violation of Title 18, United States Code, Sections 2113(d) and 2, Hobbs Act robbery in violation of Title 18, United States Code, Section 1951(a), and possession of a firearm during and in relation to a crime of violence in violation of Title 18, United States Code, Section 924(c)(1)(A)(i), as set forth in more detail in Attachment A-1, which is incorporated herein; and charging Rashere CHAMBERS with armed bank robbery in violation of Title 18, United States Code, Section 2113(d), Hobbs Act robbery in violation of Title 18, United States Code, Section 1951(a), and with two counts of brandishing a firearm during and in relation to a crime of violence in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii), as set forth in more detail in Attachment A-2 hereto, which is incorporated herein.

3. On Friday, September 3, 2021, at approximately 3:15 p.m., three unknown black males, hereinafter referred to as UNSUB 1, UNSUB 2 and UNSUB 3, robbed the Citizens Bank,

located at 5607 Vine Street, Philadelphia, Pennsylvania, by point of gun. UNSUB 1 entered the bank branch with UNSUB 2 and UNSUB 3. UNSUB 2 and UNSUB 3 stood in the man trap area and held the doors open, while UNSUB 1 approached the victim teller and handed her a demand note. The note read “This is a robbery. Give me 50,000\$ in cash we all have a 45 cal I will harm if you do not go by these commands, no dye packs no alarm 15 secs no eye contact at all!”

4. After reading the note, the victim teller told UNSUB 1 that she did not have any money in her drawer. In response, UNSUB 1 climbed over the counter and attempted to open the teller drawers. The teller told UNSUB 1 again that she didn't have any money. UNSUB 1 then pulled a black handgun out of his pocket and displayed it to the teller and the other bank employees. UNSUB 1 said “I won't touch you just give me the money.” The teller repeated that she didn't have any money. UNSUB 1 continued to attempt to open teller drawers and was successful in gaining access to a drawer from which he stole approximately \$1,200. UNSUB 1 then climbed back over the counter and fled the bank on foot with UNSUB 2 and UNSUB 3.

5. UNSUB 1 was described as a black male, around 6'0” tall with a thin build, and wearing white Adidas gloves, a black hooded sweatshirt that read, “Wild Safari,” and black, yellow, and red shoes. The other two suspects were described as slightly shorter, possibly around 5'8” – 5'10” tall, and both had thin builds; UNSUB 2 wore black clothing and white shoes, and UNSUB 3 wore black clothing and black shoes.

6. After the robbery, Philadelphia police department officers (“PPD”) and members of the FBI Philadelphia Division Violent Crimes Task Force responded to the crime scene for processing. Once on scene, members of PPD and FBI interviewed the victim and witnesses and collected video surveillance footage, still photographs, and the demand note.

7. On the same day, at approximately 6:08 p.m., three males wearing the same clothing as those who robbed the Citizens Bank robbed the 4 Seasons Food Market located at 236 South 21st Street, Philadelphia, Pennsylvania, near Philadelphia's Rittenhouse Square. Witnesses described the robbers as black males who were wearing face masks and all black clothing. One of the suspects had a hooded sweatshirt that read "Wild Safari" and wore white gloves and black, yellow, and red shoes. All three males were armed with handguns. Once inside, one of the suspects followed a store employee behind the counter and pointed a black handgun at the employee. The store employee opened the cash register and began to walk away while the suspect emptied the cash register, taking approximately \$300. The same suspect then took a green Citizen's Bank deposit bag that contained several rolls of coins. One of the other suspects turned to another store employee, pressed a black handgun into his side and demanded any money they had. This store employee handed over \$80 of his own money. The suspects then fled the store, traveling southbound on 21st Street.

8. A radio dispatch was issued at 6:15 p.m. with descriptions of the suspects. PPD Officers located all three suspects near the 600 block of South 24th Street, approximately .6 miles from the 4 Seasons Food Market, at 6:34 p.m. The three suspects were identified as Rashere CHAMBERS, Quadir SPARKS and Alonzo NORWOOD. They were wearing the same clothing and matched the physical descriptions of the suspects who robbed the Citizens Bank and 4 Seasons Food Market; CHAMBERS was wearing a "Wild Safari" sweatshirt, white gloves, and black, yellow, and red shoes; NORWOOD was wearing a black face mask, a black hooded sweatshirt with "Threads" written on the left chest and back in white letters. The clothing that CHAMBERS and NORWOOD were wearing when arrested also matches the surveillance video from the robbery of Citizens Bank. When the police surrounded them, SPARKS threw a black

and green Polymer80 9mm handgun under a silver Honda. SPARKS and CHAMBERS were arrested and taken into custody after trying to crawl under a parked car. Officers searched CHAMBERS and SPARKS incident to arrest and found that CHAMBERS was in possession of a black Smith and Wesson 9mm handgun, a piece of loose-leaf paper with a note in red crayon which read “this is a bank robbery give me 50,000 we all have weapons no dye pack no alarm 15 sec,” and \$1,291. SPARKS was in possession of a green Citizen’s Bank deposit bag that contained \$135 in bills and \$45 in coins. PPD arrested NORWOOD after a foot pursuit. During the pursuit, officers observed NORWOOD throw a black SCCY 9mm handgun on the 500 block of South 25th St. This handgun was also recovered by responding officers. NORWOOD was in possession of \$277. All three were positively identified by the victim employees of 4 Seasons Food Market.

9. On September 9, 2021, I interviewed Alonzo NORWOOD at Curran-Fromhold Correctional Facility, along with two FBI task force officers. We advised NORWOOD of his Miranda rights using an FBI form FD-395, which is an Advice of Rights form. NORWOOD read and signed the form, waiving his right to counsel, and agreed to speak with us. I confirmed, based on my review of PPD paperwork and upon conversations with PPD detectives, that PPD had not attempted to interview NORWOOD nor had NORWOOD previously invoked his right to counsel or his right to remain silent in this case. During the interview, NORWOOD told us that he was involved in the September 3, 2021 Citizens Bank armed bank robbery.<sup>1</sup> In surveillance photographs from that bank robbery, NORWOOD identified himself as well as Rashere CHAMBERS and Quadir SPARKS. He referred to CHAMBERS as “Rah” and to SPARKS as

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<sup>1</sup> NORWOOD was not asked about the 4 Seasons Food Market armed robbery during the September 9, 2021 interview.

“Qua.” NORWOOD said “Rah” (CHAMBERS) was the individual who pulled the gun during the bank robbery after jumping over the teller counter (UNSUB 1). NORWOOD also identified himself as the UNSUB 2 standing in the lobby of the bank while it was being robbed by CHAMBERS.

10. The deposits of Citizens Bank are insured by the Federal Deposit Insurance Corporation (FDIC) and were insured by the FDIC at the time of the bank robbery described above.

11. On September 3, 2021, 4 Seasons Food Market sold merchandise and otherwise provided customers with goods and services that were purchased and transported from outside of Pennsylvania.

12. Based on the information set forth above, I believe there is probable cause to charge Alonzo NORWOOD with aiding and abetting armed bank robbery in violation of Title 18, United States Code, Sections 2113(d) and 2, Hobbs Act robbery in violation Title 18, United States Code, Section 1951(a), and one count of possession of a firearm during and in relation to a crime of violence in violation of Title 18, United States Code, Section 924(c)(1)(A)(i). I further believe that there is probable cause to charge Rashere CHAMBERS with armed bank robbery of in violation of Title 18, United States Code, Section 2113(d), Hobbs Act robbery in violation

Title 18, United States Code, Section 1951(a), and with two counts of brandishing a firearm during and in relation to a crime of violence in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

Respectfully Submitted,

/s James F. Finnegan  
JAMES F. FINNEGAN  
Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed  
before me this 28th day of September 2021

/s Timothy R. Rice  
HONORABLE TIMOTHY R. RICE  
United States Magistrate Judge

**ATTACHMENT A-1**

**Count One – Aiding and Abetting Armed Bank Robbery – 18 U.S.C. Sections 2113(d) and 2**

On or about September 3, 2021, in the Eastern District of Pennsylvania, defendant Alonzo NORWOOD knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of Citizens Bank, 5607 Vince Street, Philadelphia, Pennsylvania, lawful currency of the United States, that is, \$1,200, belonging to, and in the care, custody, control, management and possession of Citizens Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant Alonzo NORWOOD knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of Citizens Bank, and other persons, by use of a dangerous weapon, that is, a firearm.

**Count Two - Robbery Which Interferes with Interstate Commerce – 18 U.S.C. Section 1951(a)**

At all times relevant to this complaint 4 Seasons Food Market, located at 236 South 21st Street, Philadelphia, Pennsylvania, was a business engaged in and affecting interstate commerce, by providing customers with goods and services produced, purchased, and transported from other states to Pennsylvania. On or about September 3, 2021, in the Eastern District of Pennsylvania, defendant Alonzo NORWOOD, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant NORWOOD unlawfully took and obtained approximately \$300 belong to 4 Seasons Food Market from an employee of that business, against his will, by means of actual or threatened force, violence, and fear of injury, immediate and future to his person and property, that is by threatening the employees with a firearm.



**Count Three - Possession of a Firearm During and in Relation to a Crime of Violence – 18 U.S.C. Section 924(c)(1)(A)(i)**

On or about September 3, 2021, in the Eastern District of Pennsylvania, defendant Alonzo NORWOOD knowingly used and carried a firearm, that is, a black SCCY 9mm semi-automatic pistol, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Two of this complaint.

**ATTACHMENT A-2**

**Count One - Armed Bank Robbery – 18 U.S.C. Section 2113(d)**

On or about September 3, 2021, in the Eastern District of Pennsylvania, defendant Rashere CHAMBERS knowingly and unlawfully, by force and violence, and by intimidation, took from employees of Citizens Bank, 5607 Vince Street, Philadelphia, Pennsylvania, lawful currency of the United States, that is, \$1,200, belonging to, and in the care, custody, control, management and possession of Citizens Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant Rashere CHAMBERS knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of Citizens Bank, and other persons, by use of a dangerous weapon, that, a firearm.

**Count Two - Robbery Which Interferes with Interstate Commerce – 18 U.S.C. Section 1951(a)**

At all times relevant to this complaint 4 Seasons Food Market, located at 236 South 21st Street, Philadelphia, Pennsylvania, was a business engaged in and affecting interstate commerce, by providing customers with goods and services produced, purchased, and transported from other states to Pennsylvania. On or about September 3, 2021, in the Eastern District of Pennsylvania, defendant Rashere CHAMBERS, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant CHAMBERS unlawfully took and obtained approximately \$300 belong to 4 Seasons Food Market from an employee of that business, against his will, by means of actual or threatened force, violence, and fear of injury, immediate and future to his person and property, that is by threatening the employees with a firearm.

**Count Three - Possession of a Firearm During and in Relation to a Crime of Violence – 18 U.S.C. Section 924(c)(1)(A)(ii)**

On or about September 3, 2021, in the Eastern District of Pennsylvania, defendant Rashere CHAMBERS knowingly used and carried a firearm, that is, a black Smith & Wesson 9mm semi-automatic pistol, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, armed bank robbery, in violation of Title 18, United States Code, Section 2113(d), and that firearm was brandished, as charged in Count One of this complaint.

**Count Four - Possession of a Firearm During and in Relation to a Crime of Violence – 18 U.S.C. Section 924(c)(1)(A)(ii)**

On or about September 3, 2021, in the Eastern District of Pennsylvania, defendant Rashere CHAMBERS knowingly used and carried a firearm, that is, a black Smith & Wesson 9mm semi-automatic pistol, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a), and that firearm was brandished, as charged in Count Two of this complaint.